IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 5 CASES LISTED IN EXHIBIT A OF PLAINTIES, NOTICE OF

EXHIBIT A OF PLAINTIFFS' NOTICE OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT REPLY OF STEPHEN M. FACTOR, M.D. FOR WAVE 5

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert reply filed against Stephen M. Factor, M.D. for Ethicon Wave 1, Dkt. 2256. Plaintiffs respectfully request that the Court grant Plaintiffs' motion, for the reasons expressed in the Wave 1 briefing.

Dated: September 1, 2017 Respectfully submitted,

/s/ D. Renee Baggett
Bryan F. Aylstock, Esq.
Renee Baggett, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200

Pensacola, Florida 32563 (850) 202-1010

(850) 916-7449 (fax) E-mail: <u>rbaggett@awkolaw.com</u>

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL Wagstaff & Cartmell LLP 4740 Grand Avenue, Suite 300 Kansas City, MO 64112 816-701-1102 Fax 816-531-2372 tcartmell@wcllp.com

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett

D. RENEE BAGGETT Aylstock, Witkin, Kreis and Overholtz, PLC 17 E. Main Street, Suite 200 Pensacola, FL 32563 850-202-1010 850-916-7449 Rbaggett@awkolaw.com